



Report No.: J031-RP
Rev. No.: 0
Work Assignment No.: 019-2JZZ
Contract No.: 68-WP-0051
March 13, 1992

Sandy Foose
U.S. Environmental Protection Agency
Region 2
Edison, New Jersey 08837

SLF
3/31/92

Re: Frederick Gumm Chemical EPI Preliminary Assessment

Dear Ms. Foose:

After review of the available background information for the Environmental Priorities Initiative (EPI) PA Frederick Gumm Chemical, and an on-site reconnaissance, a recommendation of **NO FURTHER REMEDIAL ACTION PLANNED** is proposed. Frederick Gumm Chemical is located at 538 Forest Street in Kearny, Hudson County, New Jersey and has the EPA I.D. No. NJD002175636. The recommendation is based on the following findings:

- On March 25, 1981, Frederick Gumm Chemical Company filed a Hazardous Waste Permit Application with the U.S. Environmental Protection Agency (EPA) (Ref. No. 1).
- On June 21, 1982, Frederick Gumm Chemical informed the EPA that their previous application for a Hazardous Waste Storage Permit was submitted to comply with regulations, although they weren't completely aware of their requirements. Gumm Chemical informed the EPA that they do not need the permit, based on the fact that they do not store wastes for over 90 days (Ref. No. 2)
- On November 17, 1982, Frederick Gumm Chemical responded to a New Jersey Department of Environmental Protection (NJDEP) notice of violation for failing to submit an annual report. Gumm Chemical indicated that they had not treated, stored, or shipped any hazardous wastes within the last calendar year. They also indicated that they had not generated any hazardous wastes either, but wished to retain an EPA I.D. number in case their status changed in the future (Ref. No. 3).
- On March 3, 1983, NJDEP notified Frederick Gumm Chemical that they were being excluded from regulations under N.J.A.C. 7:26-1.1 et seq. because they do not accumulate wastes on site for more than 90 days; and that the facility would be classified solely as a generator. This correspondence also retracted the previous Notice of Violation, "Failure to Submit Annual Report", on the basis that only treatment, storage, or disposal (TSD) facilities are required to submit an annual report (Ref. No. 4).
- An NJDEP inspection conducted on August 15, 1983 indicated that Frederick Gumm Chemical filed as a TSD erroneously. It was reported that the facility blends raw materials; there are no chemical reactions, and therefore no waste products are generated. Although the process does not generate any hazardous wastes, the facility wished to maintain its generator status in case they produced a bad batch or had a spill (Ref. No. 5).
- On April 14, 1987, the NJDEP conducted another inspection of the facility. It was confirmed that Frederick Gumm Chemical never generated any hazardous wastes and is not a TSD facility (Ref. No. 6).

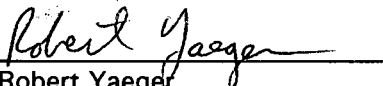
Sandy Foose
U.S. Environmental Protection Agency
March 13, 1992 - Page 2

Report No.: J031-RP
Rev. No.: 0

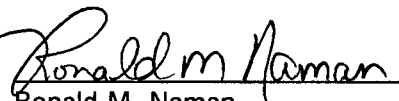
In conclusion, Frederick Gumm Chemical applied for a Hazardous Waste Permit erroneously. They were attempting to comply with regulations, and weren't fully aware of their requirements. The facility's process doesn't generate any hazardous wastes, and they were never a TSD facility. These findings substantiate the recommendation of NFRAP.

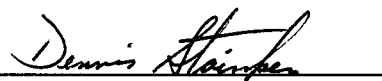
Attached are the references to support the recommendation. If you have any questions, please do not hesitate to call.

Very truly yours,


Robert Yaeger
SITE MANAGER


Gary Rojek
PROJECT MANAGER


Ronald M. Naman
SUBCONTRACT OFFICE MANAGER


Dennis Stainken Ph. D.
WORK ASSIGNMENT MANAGER

**This Report was conducted
under the following
USEPA Documentation Procedure**

**Guidance for Performing Preliminary
Assessments Under CERCLA
Publication 9345.0-01A**

REFERENCES

1. U.S. Environmental Protection Agency (EPA) Hazardous Waste Permit Application, Frederick Gumm Chemical Company Inc., EPA I.D. No. NJD002175636, May 25, 1981.
2. Letter from Lawrence J. Durney, Vice President/Technology, Frederick Gumm Chemical, to Dr. Richard Baker, Permits Administration Branch, U.S. EPA. June 21, 1982.
3. Letter from Lawrence J. Durney, Vice President/Technology, Frederick Gumm Chemical, to Frank Coolick, Bureau of Engineering Review, New Jersey Department of Environmental Protection (NJDEP). November 17, 1982.
4. Letter from Frank Coolick, Chief, Bureau of Hazardous Waste Engineering, NJDEP, to Lawrence Durney, Tech. Director, Frederick Gumm Chemical Co. March 3, 1983.
5. NJDEP Inspection Form, Frederick Gumm Chemical Co., August 15, 1983.
6. NJDEP Division of Waste Management, Inspection Report of Frederick Gumm Chemical Co., April 14, 1987.
7. Field Notebook No. HNUS004, Frederick Gumm Chemical, Nomad No. J031, On-Site Reconnaissance, HALLIBURTON NUS Environmental Corporation, Iselin, New Jersey, March 4, 1992.

REFERENCE NO. 1

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F NJ 0002175636	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE NOTED 1/2/81		GENERAL INSTRUCTIONS	
J. EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully. If any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in space below. If the label is complete and correct, you need not complete items I, II, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS					
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parentheses following the question. Mark "X" in the box in the third column. If the supplemental form is attached, if you answer "no" to each question, you need not submit any of these forms. You may submit, and if you actually do, it is excluded from permit requirements, see Section I of the instructions. See also, Section II of the instructions for definitions of basic permit terms.					
SPECIFIC QUESTIONS		MARK "X"		FORM ATTACHED	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		YES	NO	FORM ATTACHED	
			X		
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		YES	NO	FORM ATTACHED	
			X		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		YES	NO	FORM ATTACHED	
		X			
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		YES	NO	FORM ATTACHED	
			X		
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		YES	NO	FORM ATTACHED	
			X		
B. Does or will this facility (other than those described in A or B above) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		YES	NO	FORM ATTACHED	
			X		
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		YES	NO	FORM ATTACHED	
			X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowestmost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		YES	NO	FORM ATTACHED	
			X		
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		YES	NO	FORM ATTACHED	
			X		
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		YES	NO	FORM ATTACHED	
			X		

III. NAME OF FACILITY	
1	SKIP Frederick Gumm Chemical Company, Inc.

IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	
2	Durney, Larry, Technical Director
B. PHONE (area code & no.)	
201	991 4174

V. FACILITY MAILING ADDRESS	
A. STREET OR P.O. BOX	
538 Forest Street	
B. CITY OR TOWN	
Kearny	
C. STATE	D. ZIP CODE
NJ	07032

VI. FACILITY LOCATION	
A. STREET, ROUTING OR OTHER SPECIFIC IDENTIFIER	
538 Forest Street	
B. COUNTY NAME	
Hudson	
C. CITY OR TOWN	
Kearny	
D. STATE	E. ZIP CODE
NJ	07032

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	2	8	9	9	(specify)	7	(specify)
C. THIRD				D. FOURTH			
7	(specify)	(specify)	(specify)	(specify)	(specify)	(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?	
Frederick Gumm Chemical Company										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box. If "Other" specify.)											
F - FEDERAL		M - PUBLIC (other than federal or state)		P (specify)		C		A		PHONE (area code)	
S - STATE		Q - OTHER (specify)								201 991 4174	
P - PRIVATE											
E. STREET OR P.O. BOX											
1280 WALL STREET WEST											
F. CITY OR TOWN											
Lyndhurst											
G. STATE											
NJ											
H. ZIP CODE											
07071											
IX. INDIAN LAND											
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO											

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										(specify)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R										(specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture soap compounds and other chemicals used in preparing various metals for plating, painting or other finishing. F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and its attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
FREDERICK J. GUMM C.E.O.		<i>Frederick J. Gumm</i>		3/25/81	

COMMENTS FOR OFFICIAL USE ONLY

--	--	--	--	--	--	--	--	--	--	--	--

FORM
3
RCRA



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

FNJ D 002 175 636 31

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr, mo, & day)
33	34 35 36 37 38 39

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

YR.	MO.	DAY
80	12	01

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr, mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

☐ 2. NEW FACILITY (Complete item below.)

YR.	MO.	DAY

FOR NEW FACILITIES, PROVIDE THE DATE (yr, mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C									
DUP									
T/A C									
1 2 3 4 5 6 7 8 9 10									
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	55000	G		7				
2					8				
3					9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
 POUNDS.....P
 TONS.....T

METRIC UNIT OF MEASURE **CODE**
 KILOGRAMS.....K
 METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
S								T/A	C	S						T/A	C		
W	N	J	D	0	0	2	/	7	5	W	DUP						3	2	DUP
1	2							13	14	1	2					13	14		
									15								15		

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

[illegible]

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

$$FL: \frac{A}{55} \qquad FL: \frac{A}{56}$$

EPA I.D. NO.

(enter from page 1)

T/A	C
F N J D O O 2 1 7 5 6 8 6	3 6

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
7	4	0	8	0	3	0	LONG ← → LAT	0	4	0	4	6	0	0	0				
63	66	67	68	69	71	72		74	75	76	77	79							

IX A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

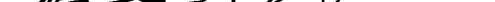
B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER													2. PHONE NO. (area code & no.)												
C E	CLERO, INC												201	460	770										
13	14												55	56	58	59	61	62	63	64	65				
3. STREET OR P.O. BOX													4. CITY OR TOWN					5. ST.		6. ZIP CODE					
C F	1280 WALSH W												C G	LYNDHURST					NJ		07071				
17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36						

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) Frederick Gumm	B. SIGNATURE 	C. DATE SIGNED 3/25/81
---	--	---------------------------

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Frederick Gumm		3/25/27

REFERENCE NO. 2

Nabil Zeki
Larry Durney
Circulation
File copy



FREDERICK GUMM CHEMICAL COMPANY, INC.

June 21, 1982

United States Environmental
Protection Agency
Region 11
26 Federal Plaza
New York, NY 10278

Attention: Dr. Richard Baker, Permits Administration Branch

Dear Dr. Baker:

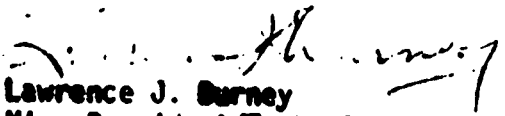
Reference is made to the application for a Hazardous Waste Storage Permit filed by Frederick Gumm Chemical Company. EPA identification number NJD002175636.

This permit application was originally filed to insure compliance with the regulations despite incomplete information on our requirements. We now find that while we may occasionally generate some wastes, these will never be stored for over 90 days. We therefor do not qualify as a storage facility and will not need the permit.

We do however need to retain our ID number for proper completion of manifests.

Yours very truly,

FREDERICK GUMM CHEMICAL CO., INC.


Lawrence J. Durney
Vice President/Technology

LJD:as

REFERENCE NO. 3

CC. Nabil Zaki
Larry Durney
Circulation
File copy



FREDERICK GUMM CHEMICAL COMPANY, INC.

November 17, 1982

Mr. Frank Coolick
BUREAU OF ENGINEERING REVIEW
32 East Hanover Street
Trenton, NJ 08625

RE: Frederick Gumm Chemical
Co., Inc. -NJ/002175636

Dear Mr. Coolick:

Reference is made to the recent notice of violation for failing to submit an annual report. This situation was discussed with Mr. William Sharples on November 15th.

On February 11, 1982, our Mr. Thomas Kosorek discussed our operation with Mr. Jonathan Berg, and based on that conversation confirmed in writing to Mr. Berg that we had not treated, stored, or shipped any hazardous wastes during calendar 1981. Copy of his letter is attached.

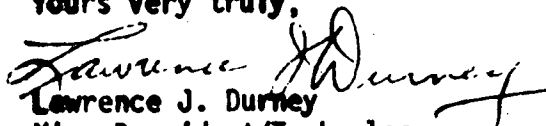
On June 21, 1982, the writer forwarded a written request to Dr. Richard Baker, U.S. E.P.A. Region II for withdrawal of our application for a Waste Storage Permit for reasons detailed in the letter. Copy of this letter is attached.

Although we did not generate any hazardous wastes in Calendar 1981, nor so far in calendar 1982, we feel we should retain our I.D. number for use in the event that wastes might be generated in the future.

Based on the conversation with Mr. Sharples, we understand that this letter and the accompanying documentation will constitute compliance with the regulations.

If there are any questions, or further requirements, please contact me.

Yours very truly,


Lawrence J. Durney
Vice President/Technology

LJD:as
Enclosure

REFERENCE NO. 4



MAR 07 1983

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON
DIRECTOR

LINO F. PEREIRA
DEPUTY DIRECTOR

03 MAR 1983

Fredrick Gumm Chemical Co.
Larry Durney, Tech. Director
538 Forest Street
Kearny, NJ 07032

RE: Facility Operating Status

Dear Sir:

The Bureau of Hazardous Waste Engineering has reviewed your company's response to the Notice of Violation, Failure to Submit Annual Report. The Bureau finds that the response contains adequate information to determine the operating status of this facility with respect to N.J.A.C. 7:26-1 et seq., the New Jersey Hazardous Waste Management Regulations. The Bureau has determined that the company's hazardous waste treatment, storage or disposal facility as delineated in the company's RCRA Part A application and identified by the following EPA ID Number:

EPA ID NO. NJD002175636

has been excluded from regulations under N.J.A.C. 7:26-1.1 et seq. because your facility accumulates hazardous waste on-site for less than 90 days. This exclusion classifies your facility solely as a generator provided the following conditions are complied with:

1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
3. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

New Jersey Is An Equal Opportunity Employer

5. For bulk accumulation of dry hazardous waste materials, the waste pile is managed according to the following:
- (i) The waste pile is no larger than 200 cubic yards; and
 - (ii) The pile shall be placed on an impermeable base that is compatible with the waste; and
 - (iii) Run-on shall be diverted away from the pile; and
 - (iv) Any leachate and run-off from the pile must be collected and managed as a hazardous waste.

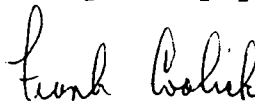
This written acknowledgement of the exclusion of the above identified facility from N.J.A.C. 7:26-1 et seq. is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occurring at the site mentioned above.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities" which would include the TSD facility annual report. It is the company's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

As a result of the conclusions previously made, the Notice of Violation entitled "Failure to Submit Annual Report" signed by Mr. David Shotwell is rescinded and need not be complied with.

If you have any questions on this matter, please call my office at (609) 292-9880.

Very truly yours,



Frank Coolick, Chief
Bureau of Hazardous Waste Engineering

FC:jb

cc Dave Shotwell
NJDEP, Division of Waste Management

Tom Taccone
USEPA, Region II

REFERENCE NO. 5

09-07-33

Office Phone:
201-460-0000



NJDEP INSPECTION FORM

LAWRENCE J. DURNEY
VICE PRESIDENT - TECHNOLOGY

FREDERICK GUMM CHEMICAL COMPANY, INC.
1280 Wall Street West, Lyndhurst, New Jersey 07071

Report Prepared for:

Generator ☒

Transporter ☐

HWM (TSD) facility ☐

Facility Information

Name: FREDERICK GUMM CHEMICAL CO.

Address: 538 FOREST ST.

KEARNY

Lot: 9

Block: 179

County: HUDSON

Phone: 201-460-7900

EPA ID#: NJ D00 2175636

Date of Inspection: 8-15-83

Participating Personnel

State or EPA personnel: DONNA DAWSON

NJDEP

Facility personnel: LARRY DURNEY, VP

Report Prepared by Name: DONNA DAWSON

Region: NORTH

Telephone #: 201-648-3669

Reviewed by: J. Berg

Date of Review: 8/24/83 OK

TIME IN _____

TIME OUT _____

TIME IN: 1:45 PM

TIME OUT: 4:30 PM

FACILITY NAME: FREDERICK GUMM CHEMICAL CO.

ADDRESS: 538 FOREST ST.

REAR NY

COUNTY: HUDSON

EPA ID #: NJ D00 2175636

DATE OF INSPECTION: 8-15-83

PHOTOS TAKEN



YES



NO

If yes, how many? _____

SAMPLES TAKEN



YES



NO

NUMBER OF SAMPLES: _____

NJDEP ID # _____

MANIFESTS REVIEWED



YES



NO

MANIFESTS HAVE NEVER BEEN USED.

Number of manifests in compliance _____

Number of manifests not in compliance _____

List manifest document numbers of those manifests not in compliance.

Arthur BeyJohn LawtonDATE: 8-15-83RECOMMENDATIONS

According to Mr. Disney, the company filed as a TSDF incorrectly; the attached correspondence indicates that they are a generator only. Since Mr. Disney said they do not generate any hazardous waste, but they wish to maintain the status in case of a bad batch or spill, I suggested that he continue to file a letter explaining why they are not submitting their annual generator report. I checked with Wayne Hovitz to see if the situation is acceptable and he said yes.

no violations were noted.

Summary of Findings

Facility Description and Operations

Company blends powdered & liquid products from standard raw materials purchased from outside vendors. No chemical reactions are run; no residues or by-products are generated. No hazardous waste is produced.

Company wishes to maintain EPA ID # in case they produce a bad batch of product or in case of a spill (they tried to get a temporary # several years ago and after 1 week of being transferred, they never got the number).

Describe the activities that result in the generation of hazardous waste.

No hazardous waste is generated.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

None

GENERATOR INSPECTION CHECKLIST

		YES	NO	N/A
7:26-8.5	<u>Hazardous waste determination</u>			
	(a) Did the generator test its waste to determine whether it is hazardous?	—	—	X
	Is the waste hazardous?	—	—	X
	Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	—	—	X
	Has hazardous waste been shipped off site since November 19, 1980?	—	—	X
	If yes, how many shipments, off site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.			
7:26-7.4(a)1	Does the generator have an EPA ID #? <i>Just in case a bad batch is produced.</i>	X	—	—
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient)	—	—	X
7:26-7.4(a)4i	The generator's name, address and phone number?	—	—	X
7:26-7.4(a)4ii	The generator's EPA ID number?	—	—	X
7:26-7.4(a)4iii	The transporter(s) name, address and phone number?	—	—	X
7:26-7.4(a)4iv	The transporter(s) EPA ID number?	—	—	X
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility?	—	—	X
7:26-7.4(a)4vi	The TSDF's EPA ID number?	—	—	X
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	—	—	X

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by the generator?	—	—	<u>X</u>
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:			
7:26-7.4(a)5i	Sign the manifest certification by hand?	—	—	<u>X</u>
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	—	—	<u>X</u>
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	—	—	<u>X</u>
7:26-7.4(a)5iv	Give remaining copies of the manifest form to the transporter?	—	—	<u>X</u>
7:26-7.4(f)1	Has the generator maintained facility records since November 19, 1980? (Manifest(s), exception report(s) and waste analysis)	—	—	<u>X</u>
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	—	—	<u>X</u>
7:26-7.4(h)2	If not,			
	1. Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at 609-292-9877 to inform the NJDEP of the situation, and	—	—	<u>X</u>
	2. Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	—	—	<u>X</u>
	Before transporting or offering hazardous waste for transportation off site, does the generator?			
7:26-7.2(a)	Conspicuously label appropriate manifest numbers on all hazardous waste containers that are intended for shipment?	—	—	<u>X</u>
7:26-7.2(b)	Insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations (i.e., 49 CFR 171 - 49 CFR 179)?	—	—	<u>X</u>

YES NO N/A

7:26-9.3

Accumulation time

How is waste accumulated on site? *NO WASTE IS ACCUMULATED*

- ☐ Containers
- ☐ Tanks (complete HWMF checklist)
 - ☐ Aboveground ☐ Below ground
- ☐ Surface impoundments (complete HWMF checklist)
- ☐ Piles (complete HWMF checklist)

7:26-9.3(a)3

Is each container clearly dated with each period of accumulation so as to be visible for inspection?

— — ~~—~~

Is waste accumulated for more than 90 days?

— — ~~—~~

If yes, complete HWMF checklist.

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSD) CHECKLIST IS FILLED OUT.

SHORT TERM ACCUMULATION STANDARDS (FOR GENERATORS WHO ACCUMULATE WASTE IN CONTAINERS FOR 90 DAYS OR LESS)

YES NO N/A

7:26-9.4

Containers

What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty five gallon drums of waste acetone).

NONE

7:26-9.4(d)3

Do the containers appear to be in good condition, not in danger of leaking?

— — X

If no, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

7:26-9.4(d)4i

Are all containers securely closed except those in use?

— — X

7:26-9.4(d)4iii

Do containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing or leaking?

— — X

7:26-9.4(d)4iv

Are containerized hazardous waste segregated in storage by waste type?

— — X

7:26-9.4(d)4v

Is every container arranged so that its identification label is visible?

— — X

7:26-9.4(d)5

Is the storage area inspected at least daily?

— — X

7:26-9.4(d)6

Are containers holding ignitable and reactive wastes located at least 50 feet (15 meters) from the facility's property line?

— — X

7:26-11.2

Tanks

What are the approximate number and size of tanks containing hazardous waste?

— — X

Identify the waste treated/stored in each tank.

YES NO N/A

General Operating Requirements

7:26-11.2(a)2

Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?

— — X

If no, please explain.

Are there leaking tanks?

— — X

7:26-11.2(a)2

Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?

— — V

7:26-11.2(3)

Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

— — X

7:26-11.2(a)4

If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?

— — X

7:26-11.2(c)

Inspections

Is the tank(s) inspected each operating day for:

1. Discharge control equipment
2. Monitoring equipment
3. Level of waste in tank
4. Construction of materials of the tank
5. Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

— — X
— — X
— — X
— — X
— — X

Are there underground tanks?

— — X

If yes, how many and can they be entered for inspection?

— — V

7:26-11.2(e)

Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

— — V

If no, please explain.

	YES	NO	N/A
7:26-11.2(f)			
Does it appear that incompatible wastes are being stored separate from each other?			X
7:26-9.4(g)			
<u>Personnel training</u>			
Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?			Y
7:26-9.4(g)2			
Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?			X
7:26-9.4(g)5			
If yes, have facility personnel taken part in an annual review of training?			X
Is there written documentation of the following:			X
7:26-9.4(g)6i			
Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?			X
7:26-9.4(g)6ii			
A written job description for each position related to hazardous waste management?			X
7:26-9.4(g)6iii			
A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?			X
7:26-9.4(g)6iv			
Documentation of actual training or experience received by personnel?			X
7:26-9.4(g)7			
Are training records kept on all employees for at least 3 years?			X
7:26-9.4(g)8			
Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?			X
7:26-9.6			
<u>Preparedness and prevention</u>			
Does the facility comply with preparedness and prevention requirements including main-			
taining:			

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.6(b)1	An internal communications or alarm system?	<u>X</u>	—	—
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	<u>X</u>	—	—
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	<u>X</u>	—	—
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	<u>X</u>	<u>X</u>	—
7:26-9.6(c)	Is equipment tested and maintained?	<u>X</u>	—	—
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?	—	—	<u>X</u>
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	—	—	<u>X</u>

If no, please explain.

In your opinion, do the types of waste on site require all of the above procedures, or are some not required?

— — X

Explain.

7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site:	—	—	—
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	—	—	<u>X</u>
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	—	—	<u>X</u>

	YES	NO	N/A
26-9.6(f)3			X
26-9.6(f)4			X
26-9.6(f)5			X
26-9.7		X	
<u>Contingency plan and emergency procedures</u>			
26-9.7(a)			
26-9.7(b)	X		
26-9.7(c)	X		
26-9.7(d)	X		
26-9.7(e)	X		
26-9.7(f)			X
26-9.7(g)	X		

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.	<u>X</u>	<u>—</u>	<u>—</u>
26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?	<u>X</u>	<u>—</u>	<u>—</u>
26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?	<u>X</u>	<u>—</u>	<u>—</u>
26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan:			
	1. Maintained at the facility; and	<u>X</u>	<u>—</u>	<u>—</u>
	2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?	<u>X</u>	<u>—</u>	<u>—</u>

REFERENCE NO. 6

INSPECTION REPORT

09-07-35

Code 06

REPORT PREPARED FOR:

- ☒ Generator
☐ Transporter
☐ HWM (TSD) Facility

FACILITY INFORMATION

Name: FREDRICK GUMM CHEMICAL CO.
Address: 538 FOREST STR
KEARNY, N.J. 07032
Lot: — Block: —
County: HUDSON
Phone: 201-991-4174
EPA ID #: NJD002175636
Date of Inspection: 04/14/87

PARTICIPATING PERSONNEL

State or EPA Personnel: BOLES LAW CZACHOR
Facility Personnel: BOB SIZELOVE - PL. MGR.

Report Prepared by Name: BOLES LAW CZACHOR
Region: 17
Telephone #: 201-669-3960
Reviewed by: Yael Emily Yael
Date of Review: 04-27-87

FACILITY NAME: FREDRICK GUMM CHEM. Co.

ADDRESS: 538 FOREST STR
KEARNY, N.J. 07032
HUDSON

TIME IN: _____

COUNTY: _____

TIME OUT: _____

EPA ID : NJD002175636

DATE OF INSPECTION: 04/14/87

PHOTOS TAKEN

☐ YES

☒ NO

If yes, how many? _____

SAMPLE TAKEN

☐ YES

☒ NO

NO. OF SAMPLES

N/A

NJDEP ID #

N/A

MANIFESTS REVIEWED

☐ YES

☒ NO

Number of manifests in compliance _____

Number of manifests not in compliance _____

List manifest document numbers of those manifests not in compliance.

CONFIDENTIAL - RECOMMENDATIONS

TO: Y. YACOB

FROM: B. PACHOR

DATE: 04/24/87

SUBJECT: FREDERICK GUMM CHEMICALS Co.

NJD002175636, RCRA COMPLIANCE.

No confidential comments or
recommendations are necessary.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

FREDERICK GUMM CHEMICAL Co., located at 538 FOREST STR, KEARNY, N.J. manufactures an alkaline cleaners for metal finishing industry. In some cases this material is meant to be substitute for solvents.

The manufacturing process involves blending of wide range of chemicals such as sulphates, phosphates, soda ash, bicarbonates and is done by batch. ALL materials involved in production process are biodegradable.

No hazardous wastes are generated in the production process. If any off spec. batch is made, it can be adjusted or redone so it is not discarded.

The company never had generated or shipped off site a load of hazardous waste.

A physical inspection of the facility revealed no environmental problems on site.

In my opinion, the documentation submitted by the company and observations made during the inspection are leading to conclusion that the company is neither generator nor TSDI under the RCRA. However the company intends to

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

retain ~~on~~ the EPA ID number for purpose if situation would change in the future they may act as ~~an~~ generator.

It appears that ~~company~~ position is reasonable and no further action on this case is necessary.

Describe the activities that result in the generation of hazardous waste.

NONE

Identify the hazardous waste located on site, and estimate the approximate quantities of each.
(Identify Waste Codes)

NONE

GENERATOR INSPECTION CHECKLIST

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-8.5	<u>Hazardous waste determination</u>			
	(a) Did the generator test its waste to determine whether it is hazardous?	—	—	—
	Is the waste hazardous?	—	—	—
7:26-8.5(b)2	Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	—	—	—
	Has hazardous waste been shipped off site since November 19, 1980?	—	—	—
	If yes, how many shipments, off site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.			
7:26-7.4(a)1	Does the generator have an EPA ID #?	—	—	—
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient)	—	—	—
7:26-7.4(a)4i	The generator's name, address and phone number?	—	—	—
7:26-7.4(a)4ii	The generator's EPA ID number?	—	—	—
7:26-7.4(a)4iii	The transporter(s) name, address and phone number?	—	—	—
7:26-7.4(a)4iv	The transporter(s) EPA ID number?	—	—	—
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility?	—	—	—
7:26-7.4(a)4vi	The TSDF's EPA ID number?	—	—	—
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	—	—	—

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by the generator?	—	—	—
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	—	—	—
7:26-7.4(a)5i	Sign the manifest certification by hand?	—	—	—
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	—	—	—
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	—	—	—
7:26-7.4(a)5iv	Give remaining copies of the manifest form to the transporter?	—	—	—
7:26-7.4(f)1	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	—	—	—
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	—	—	—
7:26-7.4(h)2	If not:	—	—	—
	1. Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at 609-292-9877 to inform the NJDEP of the situation, and	—	—	—
	2. Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	—	—	—
	Before transporting or offering hazardous waste for transportation off site, does the generator?	—	—	—
7:26-7.2(a)	Conspicuously label appropriate manifest numbers on all hazardous waste containers that are intended for shipment?	—	—	—
7:26-7.2(b)	Insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations (i.e., 49 CFR 171 - 49 CFR 179)?	—	—	—

YES NO N/A

7:26-9.3

Accumulation time

How is waste accumulated on site?

— — X

☐ Containers

☐ Tanks (complete HWMF checklist)

☐ Aboveground ☐ Below ground

☐ Surface impoundments (complete HWMF checklist)

☐ Piles (complete HWMF checklist)

7:26-9.3(a)3

Is each container clearly dated with each period of accumulation so as to be visible for inspection?

— — \$

7:26-9.3(a)1

Is waste accumulated for more than 90 days?

— — \$

If yes, complete HWMF checklist.

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSD) CHECKLIST IS FILLED OUT.

SHORT TERM ACCUMULATION STANDARDS (FOR GENERATORS WHO ACCUMULATE WASTE IN CONTAINERS FOR 90 DAYS OR LESS)

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.4	<u>Containers</u>			
	What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty five gallon drums of waste acetone).			
7:26-9.4(d)1i	Do the containers appear to be in good condition, not in danger of leaking?	—	—	—
	If no, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
7:26-9.4(d)4i	Are all containers securely closed except those in use?	—	—	—
7:26-9.4(d)4iii	Do containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	—	—	—
7:26-9.4(d)4iv	Are containerized hazardous waste segregated in storage by waste type?	—	—	—
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?	—	—	—
7:26-9.4(d)5	Is the storage area inspected at least daily?	—	—	—
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 feet (15 meters) from the facility's property line?	—	—	—
7:26-11.2	<u>Tanks</u>			
7:26-12.1(a)	Does the generator store hazardous waste in tanks?	—	—	—
	If yes, what are the approximate number and size of tanks containing hazardous waste?			

Identify the waste treated/stored in each tank.

YES NO N/A

General Operating Requirements

7:26-11.2(a)2

Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?

If no, please explain.

Are there leaking tanks?

7:26-11.2(a)2

Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures, corrosion, leaks or other failures?

7:26-11.2(3)

Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

7:26-11.2(a)4

If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?

7:26-11.2(d)

Inspections

Is the tank(s) inspected each operating day for:

1. Discharge control equipment
2. Monitoring equipment
3. Level of waste in tank
4. Construction of materials of the tank
5. Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

7:26-9.2(b)

Are there underground tanks used to store hazardous waste?

If yes, how many and can they be entered for inspection?

7:26-11.2(e)

Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

If no, please explain.

training records kept on former employees
for three years from their last date of
employment?

7:26-9.4(g)8

Are semi-annual drills conducted involving all
employees and appropriate local authorities to
test emergency response capabilities at the
facility in accordance with the contingency
plan and emergency procedures development
pursuant to NJAC 7:26-9.7?

— — —
— — —

YES NO N/A

7:26-9.6

Preparedness and prevention

Does the facility comply with preparedness
and prevention requirements including
maintaining:

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.6(b)1	An internal communications or alarm system?	—	—	—
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	—	—	—
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	—	—	—
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	—	—	—
7:26-9.6(c)	Is equipment tested and maintained?	—	—	—
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?	—	—	—
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	—	—	—
	If no, please explain.			
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	—	—	—
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site:	—	—	—
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	—	—	—
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	—	—	—

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment suppliers?	—	—	—
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	—	—	—
7:26-9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	—	—	—
7:26-9.7	<u>Contingency plan and emergency procedures</u>			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?	—	—	—
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	—	—	—
7:26-9.7(c)	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	—	—	—
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 <u>et seq.</u> ?	—	—	—
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?	—	—	—
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	—	—	—

YES NO N/A

7:26-9.7(f) Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.

— — —

7:26-9.7(g) Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?

— — —

7:26-9.7(h) Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?

— — —

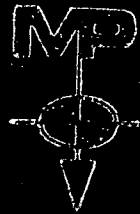
7:26-9.7(i) Is a copy of the contingency plan and all revisions to the plan:

1. Maintained at the facility; and
2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?

— — —

— — —

REFERENCE NO. 7



Field Book
748212

Projects (continued)

No

Ac

PI

Table of Contents

Page

- On-site Reconnaissance Notes

3-11

- Site Sketch

4

- Photograph Log

13-15

Robert George 3/11/92

Jim O'Leary 3/11/92

KEITH FREY
Manager
Quality & Regulatory Affairs



FREDERICK GUMM CHEMICAL COMPANY, INC.
538 Forest Street, Kearny, NJ 07032
1-800-223-GUMM • (NJ) 1-201-991-4171

Frederick Gumm Chemical
Kearny, NJ

J031
3/4/92

1005 - Arrive on site. D. Minsavage conducts
tailgate safety meeting.

Weather Conditions

Temp. - Upper 40's
Wind - Calm
Clear Skies

Halliburton NUS Personnel:

Responsibility

R. Yaeger	RY 3/4/92	Site Manager
D. Minsavage	DM 3-4-92	Site Safety Off.
S. Okulewicz	SO 3/4/92	Surveillance

Equipment

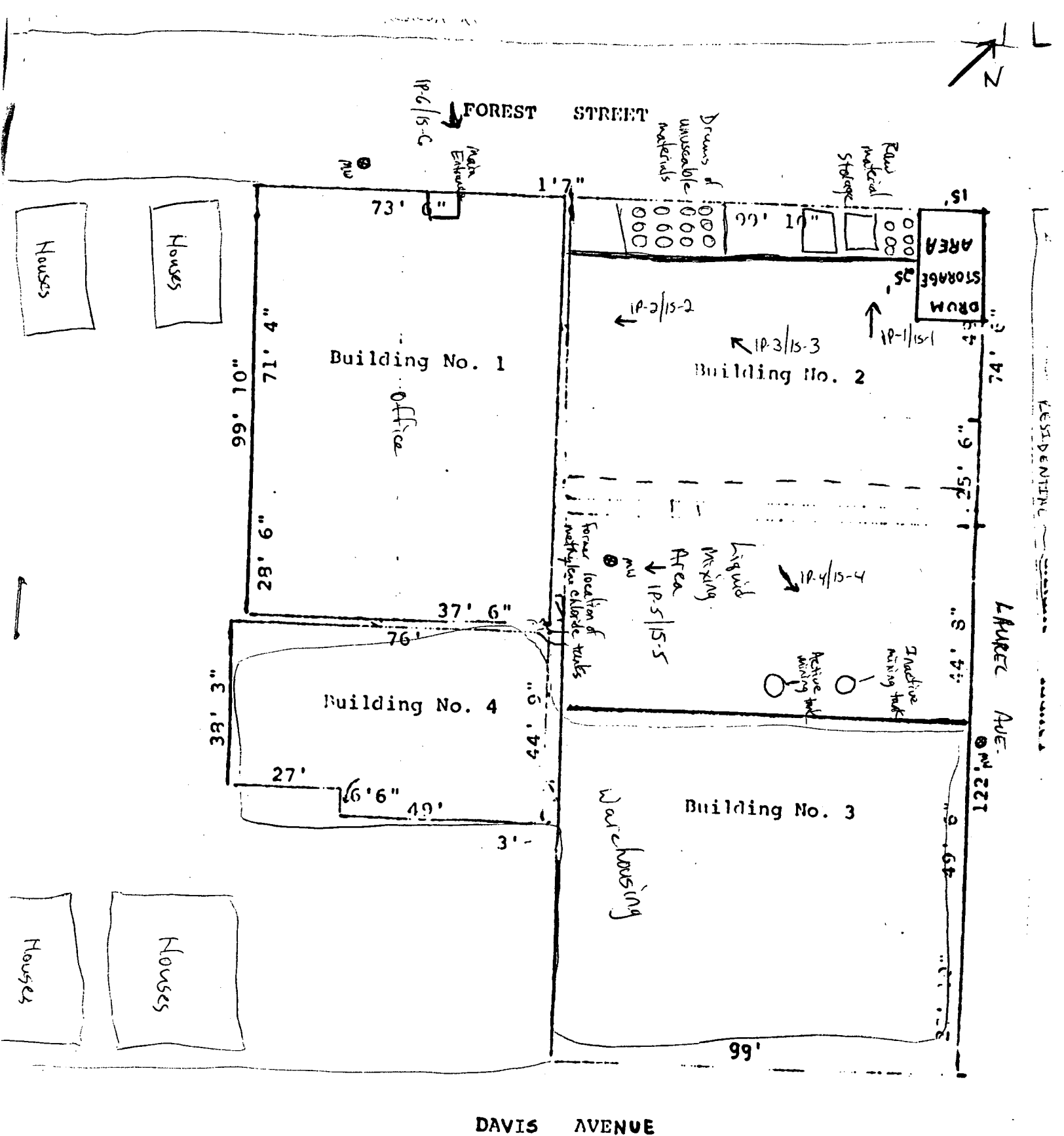
EPA ID

Background Reading

OVA	729620	0 ppm
HNA	729627	0 ppm
Mini-Rad (monitor 4)	734667	11 cpm
Cameras	734741 (Prints)	—
	734742 (Slides)	—

Robert Yaeger 3/10/92

Don O'Leary 3/11/92



BUILDING LAY-OUT
Scale 1"=30'

Robert Yager 3/10/92

for Ollay 3/11/92

4.

5.

Frederick Gumma Chemical
Kearny, NJ

J03/
3/4/92

1010 - met with Keith Frey, walked through warehouse. Operation currently uses mostly sulfuric acid and ferric sulfate. Previously handled more caustics. Currently very little production at this location.

1015 - Company has been at this site since about 1930. Everything ^{and any wastes} they may produce are piped to Passaic Valley for pH neutralization (Permit No. 15404093). However, process doesn't produce wastes.

1020 - Facility recently had 3 monitoring wells installed as part of a fuel tank removal process. One is located near the main entrance along Forest Street. There is another monitoring well along Laurel Ave.

Robert Yuesen 3/10/92

Jim O'Leary 3/11/92

Frederick Gunn Chemical
Kearny, NJ

J031

3/4/92

1021 - Production at this location has been greatly reduced recently. Main production is in North Carolina. This facility has one active mixing tank in which various chemicals are mixed to produce cleaning compounds. The process does not generate any waste products. Any batch which may be off-spec. can be ^{usually} remixed. Process only blends (no chemical reactions).

1023 - There are several drums of non-useful material ^{stored on site} which are being removed from the property within 30 days. Most of the property is currently used for warehousing.

1025 - 1P1/151 - Looking northwest towards raw materials storage area.

1027 - 1P2/152 - Photo looking southwest at stored materials.

Robert Uacqa 3/10/92

Jim (Moby) 3/11/92

Frederick Gunn Chemical
Kearny, NJ

JO31
3/4/92

1P-3/15-3

1030 - looking west towards temporary storage area of unusable materials

1031- 1P4/154 - View of mixing tanks (inactive one on the left; active one on the right); looking east.

1033 - The third monitoring well is located inside the big building. There used to be methylene chloride tanks located in the area near this monitoring well.

1035 - 1P5/155 - Southwest view from liquid mixing area towards monitoring well.

1038 - Move towards eastern end of facility. This location is primarily warehousing of containers, raw materials, and product waiting to be shipped.

Robert Yaregar 3/10/92

Tom Oltus 3/11/92

Frederick Gunn Chemical
Kearny, NJ

J031

3/4/92

1040 - 196/156 - View of main entrance of building from Forest Street, looking southeast.

1045 - Area in the vicinity of the site appears to be mixed commercial/residential. There are several residences directly across the street from and adjacent to the site. However, there does not appear to be any schools or daycare centers in the area.

1050 - Leave site.

Robert Upgren 3/10/92

Don Olsh 3/11/92

Frederick Gunn Chemical
Kearny, NJ

JD31

3/4/92

Photograph Log

* - All Photographs taken by S. Okulewicz

<u>Number</u>	<u>Description</u>	<u>Time</u>
IP-1/15-1	Looking Northwest towards raw materials storage area.	1025
IP-2/15-2	② Plot Looking southwest towards stored materials.	1027
IP-3/15-3	Looking West at temporary storage area of unusable materials.	1030
IP-4/15-4	View of mixing tanks, looking east.	1031

Robert Yager 3/10/92

Tom Okulewicz 3/11/92

Frederick Gunn Chemical
Kearny, NJ

J031
3/4/92

Photograph Log (cont'd)

Number

Description

Time

IP5/15-5

Southwest view from liquid mixing
area towards monitoring well.

1035

IP6/15-6

View of main entrance of
building from Forest Street,
looking southeast.

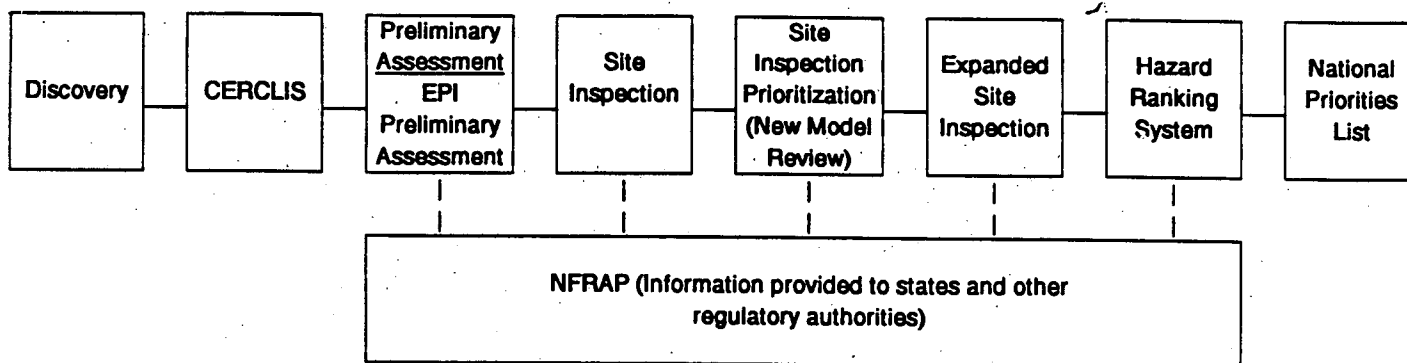
1040

Robert Gaeger 3/10/92

Don Ollney 4/11/92

ATTACHMENT 2

SUPERFUND SITE ASSESSMENT PROGRAM



SITE ASSESSMENT REPORTS

1. PRELIMINARY ASSESSMENT

- * Quick Review of Readily Accessible Records and Reports
- * Undertaken to Determine the Existence of a Problem and the Need for Further Action at a Site by Characterizing:
 - Magnitude of the Hazard
 - Source and Nature of the Release or Potential Release
 - Identification of Targets
- * Does Not Include Sample Collection

2. SITE INSPECTION

- * The Purpose of the Site Inspection is to:
 - Further Define and Characterize the Problem
 - Provide Data for the Hazard Ranking System (HRS) Scoring and Compute Initial Score
 - Identification of Targets
 - Determine the Necessity of Further Action
- * The Site Inspection Involves an On-Site Visit and Sampling (10 +/- Samples)
- * A Site Inspection is not an Extent of Contamination Study

3. SITE INSPECTION PRIORITIZATION

- * Quick Review of Readily Accessible Records and Reports
- * Undertaken to Determine the Validity and Update Background Conditions Under the New HRS Model, and the Need for Further Action at a Site by Characterizing:
 - Magnitude of the Hazard
 - Source and Nature of the Release or Potential Release
- * Included On-Site Visits or Sample Collection as needed
 - Analyze Samples/Limited Analytical Resources
 - Account for Significant Safety Hazards On-Site

4. EXPANDED SITE INSPECTION

A Follow-Up Inspection May Be Recommended After the SI To:

- * Gather Additional Data Necessary to Strengthen or Substantiate the Initial HRS Score
 - Geophysical Surveys
 - Installation of Groundwater Monitoring Wells
 - Additional Sampling

Review of Analytical Data

If previous analytical data are available, they should be reviewed for information which supports the design of the sampling and analysis program, tests site hypotheses, and documents the site score. The SI investigator should review all previous analytical data. While analytical data collected for other purposes may not meet SI objectives, site-specific analytical data are generally helpful in better understanding the nature of the problem at the site, regardless of data sources or data quality. The depth of the review depends on the overall quality and quantity of data, the intended use of the data, and whether they are representative of current site conditions and comparable to SI data. Determining whether available data can be applied as SI-generated data requires the professional judgement of an experienced reviewer. Both validated and non-validated analytical data may be available. Previous SI data will be validated and of CLP-quality. Non-validated data may contain false positives and false negatives, as well as quantitation, transcription, and calculation errors. If data of unknown or questionable quality are used for decision-making, the investigator should review all available information to assess the level of certainty associated with the data. If these data are used for HRS documentation, data validation will be necessary. The investigator should be able to determine the general quality of the data set by reviewing QC data for evaluation under the Superfund Program.